

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: TIMOTHY MCKINNEY

) Case No. 19 B 22094
)
Debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

TIMOTHY MCKINNEY

THE SEMRAD LAW FIRM LLC
via Clerk's ECF noticing procedures

848 W 103RD ST #315
CHICAGO, IL 60643

Please take notice that on May 18, 2020 at 9:00 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on April 24, 2020.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On August 06, 2019 the Debtor filed a petition under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on September 30, 2019.

A summary of the debtor's plan follows:

Monthly Payment \$175.00

Last Payment Received: 04/03/2020

Amount Paid \$942.31

Amount Delinquent \$457.69

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to the term of a confirmed plan, pursuant to § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn